

1 **BARRACK, RODOS & BACINE**
2 SAMUEL M. WARD (216562)
3 One America Plaza
4 600 West Broadway, Suite 900
5 San Diego, CA 92101
6 Telephone: (619) 230-0800
7 Facsimile: (619) 230-1874
8 sward@barrack.com

9
10 *Counsel for City of Philadelphia*
11 *Board of Pensions and Retirement*

12
13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 In re:

18 PG&E CORPORATION

19 - and -

20 PACIFIC GAS AND ELECTRIC
21 COMPANY,

22 Debtors.

23
24
25
26
27
28

17 Affects Both Debtors
18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric
20 Company

21
22
23
24
25
26
27
28

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

17
18 **JOINDER OF THE CITY OF**
19 **PHILADELPHIA BOARD OF PENSIONS**
20 **AND RETIREMENT TO SECURITIES LEAD**
21 **PLAINTIFF'S OBJECTION TO**
22 **REORGANIZED DEBTORS' MOTION TO**
23 **APPROVE SECURITIES ADR AND**
24 **RELATED PROCEDURES FOR**
25 **RESOLVING SUBORDINATED**
26 **SECURITIES CLAIMS [D.I. 9189]**

The City of Philadelphia Board of Pensions and Retirement, the holder of a Securities Claim¹ and a creditor in the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by and through its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead Plaintiff’s Objection to Reorganized Debtors’ Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities ADR Objection**”), in opposition to *Reorganized Debtors’ Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the “**Securities ADR Motion**”). In support of this Joinder, the City of Philadelphia Board of Pensions and Retirement, respectfully states as follows:

JOINDER AND RESERVATION OF RIGHTS

1. The City of Philadelphia Board of Pensions and Retirement is a Securities Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. BS@GQ27423 and SL#OA27423).

2. The City of Philadelphia Board of Pensions and Retirement incorporates by reference and hereby joins in all arguments set forth in the Securities ADR Objection.

3. The City of Philadelphia Board of Pensions and Retirement reserves its right to supplement this Joinder and further reserves its rights to participate in any hearing to consider the Securities ADR Motion, including its rights to make any arguments and to examine witnesses.

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as applicable.

CONCLUSION

For all of the foregoing reasons, The City of Philadelphia Board of Pensions and Retirement respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

BARRACK, RODOS & BACINE

By: /s/ Samuel M. Ward
Samuel M. Ward (216562)
One America Plaza
600 West Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 230-0800
Facsimile: (619) 230-1874
sward@barrack.com

*Counsel for the City of Philadelphia Board of
Pensions and Retirement*